

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PAULA THERIOT and CHERYL DOYLE,  
individually and on behalf of all others similarly  
situated,

Plaintiffs

vs.

LOUIS VUITTON NORTH AMERICA, INC.,

Defendant.

Civil Action No.: 1:22-CV-02944-DLC

**DEFENDANT LOUIS VUITTON  
NORTH AMERICA, INC.'S MOTION  
TO DISMISS PLAINTIFFS' FIRST  
AMENDED COMPLAINT UNDER FED.  
R. CIV. PROC. 12(B)(1) AND 12(B)(6)**

PLEASE TAKE NOTICE that Defendant Louis Vuitton North America, Inc., by and through its undersigned counsel, hereby moves, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rule of Civil Procedure, before the Honorable Denise L. Cote, United States District Judge, for an order dismissing Plaintiffs Paula Theriot and Cheryl Doyle's First Amended Class Action Complaint, and granting such other relief as is just and appropriate, on the grounds set forth in its contemporaneously-filed Memorandum in Support of this motion.

Dated: August 22, 2022

Respectfully submitted,

/s/ Robert E. Shapiro

Robert E. Shapiro

Maile H. Solís (*pro hac vice* forthcoming)

Connor T. Gants (*pro hac vice* forthcoming)

David B. Lurie (*pro hac vice* forthcoming)

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*Counsel for Defendant Louis Vuitton North America, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, states that on August 22, 2022, a copy of the foregoing, **DEFENDANT LOUIS VUITTON NORTH AMERICA, INC.'S MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT UNDER FED. R. CIV. PROC. 12(B)(1) AND 12(B)(6)**, was served upon all counsel of record electronically by ECF filing within the United States District Court, Southern District of New York.

Dated: August 22, 2022

/s/ Robert E. Shapiro